

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

|                                 |   |                                |
|---------------------------------|---|--------------------------------|
| <b>UNITED STATES OF AMERICA</b> | ) |                                |
|                                 | ) |                                |
| v.                              | ) | <b>Case No.: 3:06cr266-WKW</b> |
|                                 | ) |                                |
| <b>PAUL EUGENE WEBSTER</b>      | ) |                                |

**UNOPPOSED MOTION FOR EXTENSION  
OF TIME TO FILE POST-TRIAL MOTIONS**

COMES NOW the Defendant, Paul Eugene Webster, by and through undersigned counsel, Jennifer A. Hart, and moves the Court for an extension of time to file Defendant's post-trial motions, originally due on Thursday, March 15, 2007, until Wednesday, March 21, 2007. In support of this Motion, Defendant would show the following:

1. On June 9, 2007, Paul Eugene Webster was convicted, following a jury trial, of being a felon in possession of a firearm.
2. Post-trial motions are currently due in this case on March 15, 2007.
3. While preparing these Motions, Mr. Webster realized that a portion of the trial transcript has been placed under seal by Order of the Court.
4. That portion of the transcript concerns a proffer made by Defense Counsel in support of Mr. Webster's proposed theory of defense. After hearing the proffer, the Court prohibited the Defense from presenting evidence/arguments regarding the theories of defense and refused requested jury instructions on those theories.
5. Mr. Webster wishes to address these issues through post-trial motions, and wishes to cite to those portions of the transcript which are currently under seal. Likewise, the Government will need to have access to the sealed portions of the transcript to respond to Mr. Webster's motions.

6. In order that the Court may rule on that Motion, and so that Mr. Webster can file his briefs according to that rule, Mr. Webster respectfully requests a short extension in the time to file post-trial motions.

7. The Government, through Assistant United States Attorney Tommie Hardwick, has no opposition to this continuance.

WHEREFORE, the Defendant prays that this motion for extension of time to file post-trial motions be granted and that the new deadline for filing said motions be extended to March 21, 2007.

Dated this 15<sup>th</sup> day of March 2007.

Respectfully submitted,

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s/Jennifer A. Hart

**JENNIFER A. HART**  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Tommie Hardwick  
Assistant United States Attorney

Respectfully submitted,

s/Jennifer A. Hart

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